

INTERNATIONAL TELECOMMUNICATION UNION

*Telecommunication
Standardization Bureau*

Geneva, 11 October 2001

Ref: **TSB Circular 66**
COM 2/RH

- To Administrations of Member States of
the Union

Tel: +41 22 730 5887

Fax: +41 22 730 5853

E-mail: tsbsg2@itu.int

Copy:

- To ITU-T Sector Members;
- To ITU-T Associates;
- To the Chairman, Deputy Chairman and
Vice-Chairmen of Study Group 2;
- To the Director of the Telecommunication
Development Bureau;
- To the Director of the Radiocommunication
Bureau

Subject: **Use of national numbers for international services**

Dear Sir/Madam,

ITU has received some questions from Member States regarding the use of portions of the numbering space within a country code. After consultation with the Chairman of Study Group 2 and his delegated representatives, we bring the considerations below to your attention.

The numbers used for international public telecommunication (geographic area numbers, global services numbers and Network numbers), are assigned by the Director of TSB in conformance with Recommendation E.164.

In accordance with clause 7 of Recommendation E.164, international public telecommunication numbers for geographic areas (country codes) are assigned in accordance with the principles, criteria and procedures of Recommendations E.164.1 and E.190.

Clause 6.2.6 of Recommendation E.190 states in pertinent part that:

“E-Series numbering resources will only be utilized by the assignee for the specific application for which they have been assigned by the TSB.”

and

“Numbering resources may not be sold, licensed or traded. Nor may they be transferred, except in the case of a merger, acquisition, or joint venture.”

There are an increasing number of situations in which a country (often a developing country) is asked to allow a private operator to use a portion of its numbering space (for example, unused city codes within the country code) to provide international services. In some cases, the private operator

Place des Nations Telephone +41 22 730 51 11
CH-1211 Geneva 20 Telefax Gr3: +41 22 733 72 56
Switzerland Gr4: +41 22 730 65 00

Telex 421 000 uit ch E-mail: itumail@itu.int
Telegram ITU GENEVE www.itu.int

is willing to provide substantial financial advantages to the country in exchange for such use of its numbering space.

For example, it could happen that country X is requested to allow a portion of its national numbering space, say area code 123 within country code zzz, to be used by a provider of global Internet access, or call center access, or other services, where the services are based in a country other than country X.

So consumer calls made to +zzz 123 xxx xxxx would be terminated in some country other than country X, being routed without any relation to the country X identified by the country code zzz. Such calls would perhaps be subject to a tariff structure different from that of country X, so it is possible that there could be some consumer confusion if the consumer had not been aware of this prior to making the call.

The purpose of this document is to set out some guidelines for consideration by the decision-makers of countries who are confronted with such requests. These are:

- Countries should consider to what extent, if any, the arrangements that they may make with private operators could constitute a "sale, license, or trade" contrary to the provisions of clause 6.2.6 of Recommendation E.190.
- Countries should consider to what extent, if any, the arrangements that they may make with private operators could impact existing routing arrangements with international network operators, and thus impact existing services.
- Countries should consider to what extent, if any, the arrangements that they may make with private operators might be in contradiction with the intended public use of E.164 country codes and numbers. Indeed, non-geographic use of geographic country codes could cause problems in terms of international numbering plan management, especially with regard to the non-geographic codes assigned by ITU for global services.
- Most consumers expect an International public telecommunication number for a geographic area (country code) to be associated with a subscriber or a service in that actual country. The correspondence between the number and the country is published on the world-wide-web site of the ITU. Thus a country should consider whether the possible confusion arising from associating its country code with a non-national service could create political or other issues. In particular, confusion could arise because the tariff structure for the service that does not correspond to the tariff structure for a normal international call from the consumer's country to the concerned country.
- If a country allows a private operator to use a portion of its numbering space, this would normally be done in the context of a multi-year contract. Thus a country should consider whether the loss of control over its numbering space for some years could create barriers to future development of its telecommunications infrastructure and services. In particular, countries should ensure that exhaustion of the national numbering space does not occur. Countries should also consider the consequences if the private company ceases operations: would the numbering space have to be left unused for a few years before it could be reused?
- Changes in numbering plans are complex, and their implementation is expensive, slow, and difficult. Thus a country should consider whether, at the commencement or the ending of a contract with a private operator using a portion of its numbering space, it would have to envisage a change in its numbering plan. In particular, consideration should be given to the length of a number and actual numbering range to be used by the country concerned, taking into account the international implications.
- Countries should consider whether the delegation to a private company of the use of what is in effect a scarce national resource (there are a finite number of numbers in any given

numbering plan) is consistent with the country's fundamental policies and development plans.

- Countries should consider whether such use could create a precedent, which might encourage other countries to request additional code resources to undertake similar practices.
- Countries should consider whether conflicts or disputes may arise between the normal numbering range and the numbering range delegated to a private company.
- Countries should consider whether other countries might bar the entire country code, or the codes delegated to a private company, due to access problems. Any such barring might have an unexpected impact on the concerned country.

Yours faithfully,

H. Zhao
Director of the Telecommunication
Standardization Bureau